IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

CANDIDA STOKES,	*	
	*	
Plaintiff,	*	
	*	
vs.	*	**CASE NO.: 02:07-CV-686-WHA**
	*	
CITY OF MONTGOMERY, et al.	*	
	*	
	*	
Defendants.	*	

REPORT OF PARTIES' PLANNING MEETING

1. Pursuant to Fed.R.Civ.P. 26(f), the following attorneys on behalf of the parties conferred to develop a proposed discovery plan in the above styled cause.

Rachel McGinley and Deb Mattison for the Plaintiff.

Michael Boyle for the Defendants.

2. Pre-Discovery Disclosures: The parties will exchange the information required by Fed.R.Civ.P. 26(a) (1) by October 2, 2007.

3. Discovery Plan: The parties jointly propose to the Court the following discovery plan:

Discovery will be needed from allegations in Plaintiff's complaint including issues involving liability, to include any damages.

Discovery does not need to be completed in phases.

It is understood that all discovery requested, shall include a request for material which is stored electronically.

Discovery should be completed by May 15, 2008.

The Parties Agree:

Maximum of 8 depositions by each party for each party directed toward any other party with a maximum of 7 hours per deposition, unless extended by agreement of the parties.

All discovery commenced in time to be complete one week prior to the pretrial conference.

Maximum of 30 interrogatories by each party. [Responses due 30 days after service.]

Maximum of 30 requests for admissions by each party to any other party. [Responses due 30 days after service.]

Maximum of 8 depositions by each party for each party directed toward any other party with a maximum of 7 hours per deposition, unless extended by agreement of the parties.

Reports from retained experts under Rule 26(a) (2) due from the parties by March 1, 2008.

Supplementation under Rule 26(e) are due within fourteen (14) days of when a party learns that in some material respect the information disclosed is incomplete or incorrect and if the additional or corrective information has not otherwise been made known to the other parties in the discovery process or in writing.

4. Other items.

The parties do not request a conference with the Court before entry of the Scheduling Order.

The parties request a pretrial in June 2008.

All potentially dispositive motions should be filed by March 31, 2008.

Plaintiff should be allowed until April 1, 2008 to amend pleadings/add parties.

Defendants should be allowed until April 30, 2008 to amend pleadings/add parties.

Settlement and the possibility of mediation cannot be evaluated prior to discovery.

Final lists of witnesses and exhibits under Rule 26(a) (3) should be due from the parties three weeks before trial.

The parties should have 14 days after service of final lists of witnesses and exhibits to list objections under Rule 26(a) (3).

The case should be ready for trial by October 27, 2008 and is expected to take one day.

/s/ Rachel McGinley
Rachel McGinley (MCG075)
Attorney for Plaintiff

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/s/ Michael Boyle
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